

## UNITED STATES DISTRICT COURT

for the  
District of New MexicoUnited States of America  
v.PETER RYAN LYNCH  
(year of birth 1977)Case No. **23 MJ 713**

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Defendant(s)**FILED**United States District Court  
Albuquerque, New MexicoMitchell R. Elfers  
Clerk of Court**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 20, 2023 in the county of Sandoval in the  
       District of New Mexico, the defendant(s) violated:*Code Section*

26 U.S.C. §§ 5861(c) and (f)

*Offense Description*

Receipt or Possession of a Destructive Device

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.  
Complainant's signature

Special Agent Jan Hudson, HSI

Printed name and title

Telephonically sworn and electronically signed.

Date: 04/21/2023  
Judge's signatureCity and state: Albuquerque, New Mexico

Hon. Laura Fashing, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

*United States of America*

v.

Peter Ryan Lynch, Year of Birth 1977

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT**

I, Jan Stephen Hudson, duly sworn, hereby depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered to conduct investigations of, and to make arrests for, the offenses enumerated in Titles 8, 18, 19, 21, and 31 of the United States Code and other related offenses.

2. I am a Special Agent (“SA”) with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”) and have been employed as such since August of 2021.

3. As part of my employment with HSI, I completed approximately 500 hours of instruction at the Federal Law Enforcement Training Centers (“FLETC”) in Glynco, Georgia, graduating from the Criminal Investigator Training Program in February 2022. In May 2022, I graduated from the HSI Special Agent Training Program, completing an additional 500 hours of instruction in investigative techniques including but not limited to narcotics investigations, firearms investigations, and import/export related investigations.

4. Prior to my employment with HSI, I worked as a U.S. Probation Officer for the Southern District of Iowa where I was assigned to a supervision unit from 2015 to 2017. In this

capacity I was responsible for the community supervision of individuals convicted of federal crimes including but not limited to federal firearms and drug trafficking offenses. As part of this employment, I completed approximately 300 hours of training at FLETC located in Charleston, South Carolina, and graduated from the Initial Probation and Pretrial Services Training program in March 2017.

5. From 2018 to 2021, I was also employed with the Ohio Attorney General's Office, in Columbus, Ohio, where I conducted criminal and civil investigations concerning violations of antitrust and healthcare fraud and patient abuse and neglect related statutes.

6. I hold a Bachelor's degree in Sociology with a minor in Psychology and a Master's degree in Criminology and Criminal Justice.

7. I am presently assigned to the HSI Deputy Special Agent in Charge (DSAC) Albuquerque, New Mexico, duty station. In that capacity, my duties include investigating federal criminal offenses in the District of New Mexico.

8. The information set forth in the affidavit had been derived from my own investigation or communicated to me by other sworn law enforcement officers or from other reliable sources. This affidavit does not set forth all of my knowledge related to this investigation. It is submitted for the limited purpose of establishing probable cause to support a criminal complaint charging Peter Ryan Lynch (LYNCH) with 26 U.S.C. § 5861, that being receipt or possession of a destructive device.

#### **PROBABLE CAUSE**

9. On April 18, 2023, the Honorable John Robbenhaar, Magistrate Judge for the District of New Mexico, approved an anticipatory search warrant (23-MR-822) for the premises of 211 Buena Vista Ct. SE, Rio Rancho, NM 87124 (SUBJECT PREMISES). The warrant

authorized a search of the residence and the person of LYNCH, upon occurrence of certain conditions, including the acceptance of a mailed parcel known to contain firearms silencers through a controlled delivery process. The parcel had been mailed to LYNCH from China.

10. Leading up to obtaining the anticipatory search warrant, law enforcement confirmed LYNCH resided at the SUBJECT PREMISES through review of LYNCH's driver's license, confirmation that LYNCH received mail at the residence, and physical surveillance establishing LYNCH's presence and vehicles at the SUBJECT PREMISES.

11. On April 20, 2023, after the conditions of the anticipatory search warrant were met, agents executed the search warrant at the SUBJECT PREMISES. While clearing the residence, but prior to executing the complete search, law enforcement located several "pipe bombs" and related materials. Upon this discovery, agents sought and received an amended search warrant that was issued by the Honorable Judge John Robbenhaar, under the same cause number (23-MR-822). The amended search warrant authorized an expanded search for additional items to include destructive device(s) and components, within the meaning of 26 U.S.C. § 5845(f). Agents proceeded to execute the expanded search warrant on the same day.

12. During the initial and subsequent search, agents located at least four "pipe bombs" inside a backpack located in a closet in the master bedroom of the SUBJECT PREMISES, which was LYNCH's bedroom. More specifically, there was one fully constructed pipe bomb consisting of a PVC pipe, two end caps and a fuse/ignition system. There was black-colored powder inside the PVC pipe, consistent with gun powder or Pyrodex Power. Members of the New Mexico State Police Bomb Squad in conjunction with agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) preliminarily confirmed that this pipe bomb was functional and capable of detonation, such that it may be classified as an improvised explosive device (IED). Additional

analysis is pending. The other three pipe bombs consisted of two smaller PVC pipes with end caps, and one larger metal pipe fitted with end caps and a fuse. Additional analysis is pending on these items as well.

13. Based on my training and experience, I know that the components identified above constitute what is commonly referred to as a “pipe bomb.” It is illegal to possess these items, including the component, pursuant to 26 U.S.C. § 5861(c). A “pipe bomb” is considered a “destructive device” which includes: “any explosive, incendiary or poison gas (A) bomb...or (F) similar device...and (3) any combination of parts either designed or intended for use in converting any device into a destructive device...and from which a destructive device may be readily assembled.” 26 U.S.C. § 5845(f).

14. In addition to the four pipe bombs described above, law enforcement located several inert grenades, which are commonly sold as collectors’ items. When grenades are sold in this fashion, a hole is drilled into the end and the internal components are removed. At least one of the grenades recovered at the LYNCH’s residence had the hole filed, which is consistent with preparing the device to be filled with a propellant.

15. Agents further seized a shotgun with corresponding ammunition during a search of the living room and located a ballistic vest in LYNCH’s master bedroom.

16. Based on the information set forth above, I submit there is probable cause to believe that on or about April 20, 2023, in the County of Sandoval, in the District of New Mexico, Peter Ryan LYNCH did knowingly and intentionally possess a destructive device in violation of 26 U.S.C. § 5861.

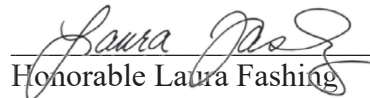
17. Assistant United States Attorney Sarah Mease approved this affidavit.



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Jan S. Hudson  
Special Agent  
Homeland Security Investigations  
Department of Homeland Security

Subscribed electronically and sworn telephonically  
on April 21, 2023:



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Honorable Laura Fashing  
United States Magistrate Judge